Frequently Asked Questions: myRCRAid & e-Manifest

MassDEP has prepared this fact sheet to provide answers to common questions about the transition to U.S. Environmental Protection Agency (EPA) online tools **myRCRAid** for hazardous waste identification numbers (EPA IDs) and **e-Manifest** for electronically tracking hazardous waste shipments.

Obtaining a Hazardous Waste (HW) Generator Identification Number (EPA ID)

Q: Using myRCRAid, how long will it take me to obtain a new HW generator identification number?

A: Between one and seven business days.

MV Numbers

Q: May I use an MV plus phone HW IDs (e.g., MV6170001111) on a hazardous waste manifest now that EPA has launched the e-Manifest system?

A: While MassDEP no longer accepts *new* MV plus phone number ID applications, you may for the time being use an existing MV number (issued before June 15, 2018).

But you may not use an MV plus phone number ID to register as an e-Manifest user. This means you will not be able to track your shipments electronically or see copies of your manifests online for 90 days, when they will be available via the e-Manifest public viewer. For these reasons, MassDEP strongly recommends that you apply for a new EPA compatible generator ID number via myRCRAid as soon as possible. To do so, login or create an account at RCRAInfo.

Temporary ID Numbers

Q: May I still use an MP plus phone number ID (e.g., MP6170001111) for a temporary HW generator ID?

A: No. "MP" numbers may no longer be used on manifests for hazardous waste shipments in Massachusetts.

Q: What do I do if I need an EPA ID number temporarily for a non-emergency?

A: If you need a temporary HW generator ID number for a scheduled pickup that is not an emergency, use myRCRAid to obtain it. To do so, login or create an account at RCRAInfo. In the Site Name field, add the words "Temporary ID." When you are done using the number, deactivate it via myRCRAid.

Q: I'm a Licensed Hazardous Waste Transporter Responding to an Emergency Spill Incident. What do I use for an EPA ID number on the manifest?

A: Hazardous waste transporters responding to emergency response events need to use their own HW generator ID number when completing manifests for wastes from spill sites. The use of "temporary" MP plus phone number IDs is no longer allowed. <u>Learn more</u>.

E-Manifest

Q: Do I need to continue mailing copies of my manifests to MassDEP as required at 310 CMR 30.313(4)(b)?

A: No. The regulation states that for wastes you generate and ship directly to an out-of-state designated facility, you need to submit a photocopy of Copy 3 to MassDEP within 30 days of receiving it from the designated facility. When you use the EPA e-Manifest system, this requirement will be met automatically since MassDEP will be able to see the manifests online.

If you continue using an MV plus phone number ID, you won't be able to register as an e-Manifest user or see copies of your manifests for 90 days, when they will be available via the e-Manifest public viewer.

So, if you still use an MV number, you should ask your transporters and/or designated facilities for fully executed copies of all manifests and keep them on-site. Please note that neither the transporter nor the facility is obligated to comply with this request. Also, if you are unable to produce a fully executed copy of a manifest within 45 days, you may need to submit an Exception Report to MassDEP (see 310 CMR 30.333).

For these reasons, MassDEP strongly recommends that you apply for a new EPA compatible generator ID number via myRCRAid so you can easily track and document your hazardous waste shipments. To do so, login or create an account at RCRAInfo.

MassDEP will rescind the regulation at 30.313(4)(b) when it adopts the EPA e-Manifest rule.

Q: Are HW transporters still required to submit Electronic Monthly Operating Reports (EMORs)?

A: Yes. MassDEP still requires transporters to submit EMORs. e-Manifest does not track out-of-country shipments or provide all of the information required at 310 CMR 30.407: Reporting.